

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PEARL DELTA FUNDING LLC;

Plaintiff,

~ against ~

ILLINOIS COLLECTION SERVICE INC.;
DJC MANAGEMENT & CONSULTANTS, INC.;
PALM BEACH COLLECTION MANAGEMENT, INC.;
BUSINESS OFFICE SOLUTIONS;
ICS COLLECTION SERVICE, INC.;
ICS, INC.; and
JOHN CRONIN,

Defendants.

Civil Action No. **2:23-cv-01153**

**DEMAND FOR
VERIFIED STATEMENT
PURSUANT TO
LOCAL CIVIL RULE 26.1**

TO COUNSEL FOR THE PLAINTIFF:

Pursuant to Local Civil Rule 26.1(a) and (b), the Defendants respectfully Demand that a Verified Statement be furnished to the Undersigned Counsel for the Plaintiff within seven (7) days, which Statement shall set forth the following:

- (i.) The residence and domicile; and any state or other jurisdiction of which the partners and members of the Plaintiff are a citizen for purposes of 28 U.S.C. § 1332;
- (ii.) The residence and domicile, and any state or other jurisdiction of which the partners and members of each person and entity in the Plaintiff's chain of ownership are a citizen for purposes of 28 U.S.C. § 1332;
- (iii.) The Plaintiff's state or other jurisdiction of formation; *and*
- (iv.) The state or other jurisdiction of formation for each person and entity in the Plaintiff's chain of ownership.

As provided in the Committee Note on Local Civil Rule 26.1, this Demand is made in order to make it more possible to quickly determine whether there may be a basis to challenge the diversity jurisdiction alleged in the Notice of Removal.

I appreciate your cooperation with this Demand and feel free to be in touch if you have any questions about this matter.

Dated: February 12, 2023

RESPECTFULLY SUBMITTED,

By:

A handwritten signature in blue ink, appearing to read "Baruch S. Gottesman", is written over a light blue rectangular background. A solid black horizontal line is positioned directly beneath the signature.

Baruch S. Gottesman, Esq.
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